

## REMARKS

Claims 1 and 4 – 21 are pending in the present application.

### **Claims 1, 4 – 7 and 12 – 14 are Patentable Over *Conwell***

Claims 1, 4 – 7 and 12 – 14 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,350,071(*Conwell*). *Conwell* does not teach or suggest a UV curing module with all the limitations of independent claim 1 or of claims 4 – 7 and 12 – 14. For example, *Conwell* does not teach or suggest a UV curing module attached to a label re-winder. The Examiner asserts that the UV curing module attaching to a label re-winder is a mere functional limitation and a mere statement of intended use. Applicant respectfully disagrees. Applicant was earlier required to elect between Figure 2 directed to a UV curing module attached to a re-winder and Figure 1 directed to a UV curing module attached to a label applicator. Thus, the UV curing module attached to a re-winder is independent and distinct and not a mere functional limitations. Because the UV curing module attached to a re-winder is independent and distinct and not mere functional language, Applicant respectfully asserts that Claims 1, 4 – 7 and 12 – 14 are patentable over *Conwell*.

### **Claims 11 is Patentable over *Conwell* in View of *Lincoln***

Claim 11 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Conwell* in view of US Patent No. 5,935,525 (*Lincoln*). *Conwell* does not teach or suggest a UV curing module with all the limitations of Claim 11. For example, as discussed above, *Conwell* does not teach or suggest a UV curing module attached to a label re-winder. By way of a further example, *Conwell* does not teach or suggest a UV curing module with a reflector. *Lincoln* does not make up the deficiencies in *Conwell*. *Lincoln* relates to an air treatment system that reduces and destroys volatile organic compounds, NO<sub>x</sub> and CO in an exhaust air stream. There must be some teaching, suggestion or motivation to combine the cited references. There is no such teaching, suggestion or motivation and one skilled in the art would not look to air treatment systems. Accordingly, Claim 11 is patentable over the cited art.

### **Claims 8 – 11 and 15 – 21 are patentable Over *Conwell* in View of *Ylitalo***

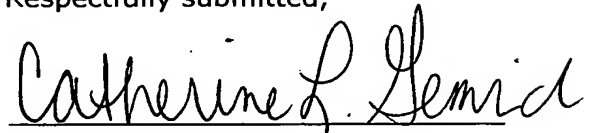
Claims 8 – 11 and 15 – 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Conwell* in view of US Patent No. 6,543,890 (*Ylitalo*). *Conwell* does not teach or suggest a UV curing module with all the limitations of Claims 8 - 11. and 15 – 21. For example as discussed above, *Conwell* does not teach or suggest a UV curing module attached to a label re-winder. By way of a further example, *Conwell* does not teach or suggest a UV curing module with at least one filter. *Ylitalo* is not prior art and

thus does not make up the deficiencies in *Conwell*. *Ylitalo* was filed on 19 December 2001. The present application claims the benefit of US Provisional Application No. 60/283,113 filed 11 April 2001 and US Provisional Application No. 60/287,842 filed 1 May 2001. Accordingly, Applicant respectfully asserts that the Examiner should not have relied upon *Ylitalo* and that Claims 8 – 11 and 15 – 21 are patentable over the cited art.

**CONCLUSION**

Applicant asserts that all of the objections have been overcome, and now requests further consideration on the merits.

Respectfully submitted,

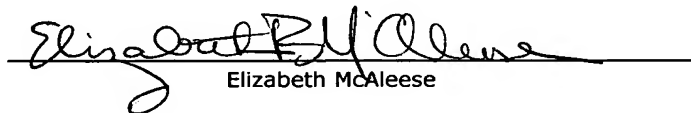


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